

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA

v.

JAREC DOMINIQUE BROWN,

Defendant.

No. 3:23-cr-141

STATEMENT OF FACTS

The United States and the defendant, JAREC BROWN, agree that the factual allegations contained in this Statement of Facts and in Count One of the Indictment in this case are true and correct, and that the United States could have proven them beyond a reasonable doubt.

1. On or about September 29, 2022, in the Eastern District of Virginia, and within the jurisdiction of this Court, the defendant, JAREC DOMINIQUE BROWN, did knowingly possess a machine gun, specifically, a combination of parts, commonly known as a “switch” and/or “conversion switch,” designed and intended for use in converting a weapon to shoot automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of 18 U.S.C. § 922(o).

2. On September 29, 2022, a Hanover County, Virginia, deputy sheriff pulled over a vehicle in which defendant was a passenger. During the course of the stop, the deputy had cause to lawfully search a backpack that had been located at defendant’s feet in the front passenger seat of the car. Defendant acknowledged that the backpack was his and that he had a firearm inside it.

3. The deputy subsequently recovered from that backpack a Glock 9mm Lugar caliber pistol, model 19, serial number BTPH673. The firearm was equipped with a machinegun conversion device, also known as a “switch” or “conversion switch,” that is intended and did convert the Glock 9mm pistol to fire fully automatically more than one shot, without manual reloading, by a single function of the trigger.

4. Both the Glock 9mm pistol and the machinegun conversion device are “machineguns” within the meaning of 18 U.S.C. § 921(a)(24) and 922(o), and 26 U.S.C. § 5845(b).

5. At the scene of the stop, defendant acknowledged that he had obtained the machinegun conversion device and was aware that it rendered the Glock 9mm to fire fully automatically.

6. Defendant committed the offense charged in Count One of the indictment knowingly and unlawfully and not as a result of mistake or accident.

Respectfully submitted,

JESSICA D. ABER
UNITED STATES ATTORNEY

By:



Stephen W. Miller
Assistant United States Attorney

I have consulted with my attorney regarding this Statement of Facts. I knowingly and voluntarily agree that each of the above-recited facts is true and correct and that had this matter gone to trial the United States could have proven each one beyond a reasonable doubt.

1/25/24
Date

Jarec Brown
Jarec Brown

I am counsel for defendant, JAREC BROWN. I have carefully reviewed this Statement of Facts with him and, to my knowledge, his decision to agree to this Statement of Facts is an informed and voluntary decision.

1/25/24
Date

Paul G. Gill
Paul G. Gill
Counsel for Defendant